



The Printed Word

...More than just ink on paper

Anti-Bribery and Corruption Policy

Version 1.0

Anti-Bribery and Corruption Policy

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Anti-Bribery and Corruption Policy

Version Control

VERSION	REVIEWER NAME	DATE	NEXT REVIEW	COMMENTS
1.0	Policy Pros	Nov 2023	Nov 2024	First Policy.

Anti-Bribery and Corruption Policy

Introduction

It is the Policy of The Printed Word to conduct all business in an honest and ethical manner.

We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems to counter bribery and corruption.

Understanding and recognising bribery and corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Very generally, **bribery** is defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

This could cover seeking to influence a decision-maker by giving some kind of extra benefit to that decision-maker rather than by what can legitimately be offered as part of a tender process. (Ministry of Justice)

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

Corruption is defined by the Department for Business and Trade as "the abuse of entrusted power for private gain."

Examples of this are:

- Abuse of the power given to an individual by another person or organisation.
- Activity that is beyond the position or remit of a person.
- Benefits obtained for an employee or colleague's personal gain rather than for their organisation.

Conflicts of Interest are where an individual has two or more interests (for example, private and work-related) that compete.

An individual may, for example, use their position to their advantage for financial gain (whereby damaging one of their interests) or to compromise the fairness or impartiality of a tender or transaction (which unfairly benefits one of their interests).

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Policy and Procedure

The Printed Word will take appropriate steps to ensure that:

1. We do not, directly or indirectly, offer, promise, give, accept, or demand a bribe or other undue advantage (including excessive gifts and hospitality) to obtain or retain business or gain any other improper advantage.
2. We do not offer nor give in to demands to make illicit or illegal payments to agents, subcontractors, public officials (at any level), the employees or colleagues of business partners or anybody else we do business with.
3. We engage and remunerate agents, our clients and other third parties only for legitimate services and adopt appropriate transparency in our approach.
4. We adopt control systems that discourage bribery and corruption and adopt financial and tax accounting and auditing practices that prevent the establishment of "off the books" secret accounts or the creation of documents that do not properly and fairly record the transactions to which they relate.
5. We promote awareness of and compliance with company policies against bribery and corruption through appropriate dissemination of this policy and procedure.

Gifts and Hospitality

Although offering hospitality and gifts is not a routine practice, we do acknowledge that we may, on occasion, make donations to local good causes and/or offer refreshments to stakeholders visiting our premises. In addition, it is acknowledged that our clients and stakeholders may provide our colleagues with small tokens of their appreciation, for example, a box of chocolates following the completion of a job.

It is, therefore, our policy that gifts and hospitality may be given and accepted so long as they meet the following requirements:

- They are not made to influence the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- They are not made with the suggestion that a return favour is expected.
- They follow local law.

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- They follow the policy of the receiving party.
- They are given and received in the name of the Company.
- They do not include cash or a cash equivalent.
- They are of an appropriate type and value and given at an appropriate time.
- They are given/received openly, not secretly.
- They are not seen as excessive. For example, anything over a token gesture must not be given or received unless it is beneficial to a local good cause and is made as a charitable donation (Please see our Corporate Social Responsibility Policy for more information).
- They are approved by the Managing Director.
- They are not offered to or accepted from a government official, political representative, politician or political party.

Where it is inappropriate to decline the offer of a gift (i.e., when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the Managing Director.

Record Keeping

All accounts, receipts, invoices and other documents and records relating to dealings with third parties are prepared and maintained with strict accuracy and completeness. No accounts are kept 'off the record' to facilitate or conceal improper payments.

We will regularly undertake financial audits to identify red flags, such as:

- Inconsistent financial records, including missing records of payments, large or one-off payments coming into or going out of the business, large payments made in cash, payments made to third parties not previously known to the business, large supplementary payments made to colleagues, etc.
- Missing documentation or excessive adjustments in account records.
- Missing or excessive funds otherwise moving into or out of the business accounts.

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Colleague Support

It may not always be a simple matter to determine whether a possible course of action is appropriate or may breach this Policy. Therefore, if you are in any doubt as to whether a possible act might be in breach of this Policy or the law, the matter should be referred to the Managing Director or another director in their absence.

How to Raise a Concern

The prevention, detection and reporting of bribery or corruption is the responsibility of all colleagues.

If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this without delay to Rob Pryer, Managing Director or another director in their absence.

Penalties for Non-Compliance

Individuals or organisations convicted of the offences of bribing another, being bribed or bribing a foreign public official can be liable on conviction to unlimited fines, and individuals can receive a jail sentence of up to 10 years. (Under The Bribery Act 2010)

An organisation can be convicted for failure to prevent bribery, with the penalty being an unlimited fine. (Under The Bribery Act 2010)

Therefore, if you fail to follow this Policy, you put yourself, your colleagues and The Printed Word at risk.

Any colleague found to be giving or receiving bribes or engaging in any other act of corruption or otherwise breaching this Policy will be subject to disciplinary action, which may ultimately lead to dismissal or immediate severance of any working agreement/contract in place.

Where appropriate and a crime has been committed, we will also make a report to the appropriate authorities.

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Monitoring and Reviewing

The Printed Word is committed to ensuring our policies are effective and up-to-date. To do this, we have a process for regularly monitoring and reviewing them.

The Senior Management Team is responsible for this process and will review this policy at least once a year or more frequently if needed due to changes in laws or our practices.